



MEMO ENDORSED

U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 13, 2024

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

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**Re: United States v. Valeria Ruth HaCohen et al., S1 20 Cr. 648 (ALC)**

Dear Judge Carter,

The Government respectfully submits this letter on behalf of the parties to request (i) a 30-day adjournment of the May 16, 2024 status conference; and (ii) a 30-day adjournment of the motion schedule in this case. Opening briefs are currently scheduled to be filed on May 24, 2024. The parties continue to engage in separate negotiations regarding potential resolutions, which the Government expects will be concluded within the next 30 days. Accordingly, the proposed adjournment would conserve judicial resources and economy while the parties complete their negotiations. For the same reasons, the Government respectfully requests, with the consent of the defendants, that the Court exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) through the date of the rescheduled status conference in this case.

Accordingly, the Government respectfully requests, with the consent of the defendants, that the Court grant the parties' request for a 30-day adjournment of the status conference and motion schedule, and a related exclusion of time under the Speedy Trial Act.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: \_\_\_\_\_ /s/  
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cc: Counsel of record (by ECF)  
The application is **GRANTED**. The motion schedule and May 16, 2024 status conference are adjourned. A status conference is set for 6/20/24 at 12:30 p.m. Time excluded from 5/16/24 to 6/20/24 in the interest of justice.

So Ordered.

*Andrea Z. Carter* 5/14/24